


EXHIBIT Q

 **FILED IN OFFICE**
CLERK OF SUPERIOR COURT
DECATUR COUNTY, GEORGIA
23CV00260
LAWTON C. HEARD, JR.
FEB 02, 2024 02:26 PM


Cecilia Willis, Clerk
Decatur County, Georgia

IN THE SUPERIOR COURT OF DECATUR COUNTY

STATE OF GEORGIA

[illegible]

**RESPONSE
TO
MOTION FOR RECONSIDERATION
OR
IN THE ALTERNATIVE TO
SET ASIDE THE VALIDATION ORDER**

Defendant Decatur County-Bainbridge Industrial Development Authority (“Defendant Authority”), by and through its undersigned counsel and at Defendant Authority’s direction, hereby responds to Plaintiff’s Motion For Reconsideration Or In The Alternative To Set Aside The Validation Order (“Plaintiff’s Motion”), and respectfully shows this Court as follows:

Defendant Authority objects to the factual assertions and legal conclusions contained in Plaintiff's Motion, and respectfully requests the Court ignore the same in reaching any resolution of Plaintiff's Motion, any other filings before, or that may (or may have already) come before, the Court in this matter, and to ignore the same in the consideration of any future matters in which Defendant Authority, or its counsel, may appear before this Court.

On February 2, 2024, Defendant Authority voted (a) to revoke its approval of the Bond Resolution, which Defendant Authority had adopted on December 11, 2023 (including all related documents), (b) to consent to the rescission of the Court's Bond Validation Order, dated January 2, 2024, (c) to consent to the withdrawal of all answers and acknowledgments and other pleadings in this matter, (d) to consent to the rescission of the District Attorney's Petition and Complaint, filed December 14, 2023, (e) to consent to the dismissal of this action, including all pleadings, motions, notices, etc., (f) to consent to the rescission of Defendant Authority's Notice to the District Attorney, dated December 11, 2023, and (g) to direct the undersigned counsel to file this Response, all with out prejudice to the parties in this action.

Defendant Authority reserves any right to provide an additional response to the Court at a hearing, if any, of this matter.

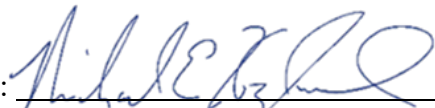
CONCLUSION

Having provided an initial response to Plaintiff's Motion, Defendant Authority respectfully requests this Court:

- (a) dispose of Plaintiff's Motion on the papers, with out a hearing,
- (b) rescind the Court's Bond Validation Order, dated January 2, 2024,
- (c) rescind the filing of all answers and acknowledgments and other pleadings in this matter,
- (d) rescind the filing of the District Attorney's Petition and Complaint, filed December 14, 2023,
- (e) dismiss this action, including all pleadings, motions, notices, etc.,
- (f) acknowledge the rescission of Defendant Authority's Notice to the District Attorney, dated December 11, 2023,

- (g) acknowledge the rescission of Defendant Authority's approval of the Bond Resolution, which Defendant Authority had adopted on December 11, 2023 (including all related documents),
- (h) order each party to bear its own costs and fees, and
- (i) grant such other and further relief, consistent with the relief above requested, as the Court may deem just and proper, all with out prejudice to the parties in this action.

Respectfully submitted, February 2, 2024.

By: 
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